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UNITED STATES DISTRICT COURT **DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, CASE NO. 2:22-cr-00002-RFB-EJY Plaintiff, STIPULATION TO CONTINUE VS. BRIEFING SCHEDULE (First Request) HRANT KASBARIAN, Defendants.

IT IS HEREBY STIPULATED by and between Kathleen Bliss, Esq., Counsel for Defendant Hrant Kasbarian, and Kimberly Sokolich, Assistant United States Attorney, that the Court vacate its current deadlines set for supplemental briefing in this case. The parties thus stipulate that Defendant's supplemental sentencing brief, due on September 28, 2022, be moved by this Court to October 3, 2022. Defendant agrees that the Government's response deadline be set by the Court on October 6, 2022. Sentencing is set on October 7, 2022, at 9:30 a.m. The reasons for this Stipulation are as follows:

- 1. On September 8, 2022, the Court continued sentencing until October 7, 2022, allowing the parties to file additional briefing after the Court noticed the parties that the Court was considering an upward departure from the Guideline Sentencing Range of 24 - 30 months. ECF No. 47.
- 2. Counsel for Defendant began trial on September 12, 2022, in United States v. Munoz,

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3.	The following week, counsel for Defendant had to deal with a family circumstance
	requiring full attention that is ongoing.
4.	Counsel for Defendant, while communicating with him throughout this case, needs

Case No. 3:21-cr-0010-MMD. The trial concluded on September 16, 2022.

- 4. Counsel for Defendant, while communicating with him throughout this case, needs additional time to do so before filing the supplemental briefing in order to satisfy her Sixth Amendment obligations.
- 5. Failure to grant this continuance would deny Counsel for the Defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

/s/ Kimberly Sokolich
Kimberly Sokolich
Assistant U.S. Attorney

/s/Kathleen Bliss____

Counsel for Hrant Kasbarian

Dated this 27th day of September 2022.

ORDER

The Court, having considered the representations of the parties and finding good cause, ORDERS that Defendant shall have until October 3, 2022, to file any supplemental briefing and the Government shall have until October 6, 2022, to file any response. Sentencing shall remain October set on September 7, 2022, at 9:30 a.m.

DATED: September 27, 2022

